

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS  
IGOIN, LAURENCE APFELBAUM,  
individually and in her capacities as executor  
and beneficiary of the Estate (Succession) of  
Doris Igoi, and EMILIE APFELBAUM,

Defendants.

Adv. Pro. No. 10-04336 (SMB)

**STIPULATION EXTENDING DEFENDANTS' TIME TO RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time for Defendants The Estate (Succession) of Doris Igoi, Laurence Apfelbaum, individually and in her capacities as executor and beneficiary of the Estate (Succession) of Doris Igoi, and Emilie Apfelbaum ("Defendants") to answer, move against, or

otherwise respond to the Trustee's Complaint, filed in the above-captioned case, is extended up to and including March 20, 2015.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including, without limitation, any defenses based on lack of jurisdiction.

**IT IS FURTHER STIPULATED AND AGREED** that this stipulation may be signed by counsel for the parties in counterparts and by facsimile.

Dated: March 11, 2015

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Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L.  
Madoff*

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Apfelbaum, and Emilie Apfelbaum*